

1
IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

ERIC D. RIGBY,)
Plaintiff,)
v.) Civil Action No.
CROSSCHECK SERVICES, LLC,) 3:19-cv-00036
d/b/a, OPTIO SOLUTIONS, LLC,)
d/b/a QUALIA COLLECTION,)
Defendant.)

DEPOSITION UPON ORAL EXAMINATION OF

PINKIE WOOD

TAKEN ON BEHALF OF THE DEFENDANT

NORFOLK, VIRGINIA

OCTOBER 10, 2019

1	Appearances:	1	I N D E X
2		2	
3	SULAIMAN LAW GROUP, LTD.	3	WITNESS
4	BY: NATHAN C. VOLHEIM, ESQUIRE	4	PINKIE WOOD:
	2500 SOUTH HIGHLAND AVENUE	5	Examination by Mr. Little
	SUITE 200		4
5	LOMBARD, ILLINOIS 60148		22
6	(630) 568-3056		
7	Nvolheim@sulaimanlaw.com		
	Counsel for the Plaintiff		
	(Appearing via telephone)		
8			
9	LIPPS MATHIAS WEXLER FRIEDMAN, LLP	10	E X H I B I T S
10	BY: BRENDAN H. LITTLE, ESQUIRE		
11	50 FOUNTAIN PLAZA	11	
12	SUITE 1700	12	PAGE
13	BUFFALO, NEW YORK 14202	13	NO. DESCRIPTION
14	(716) 853-5100	14	1 Complaint
15	Blittle@lippes.com	15	2 Plaintiff's Amended Supplemental Answers
16	Counsel for the Defendant	16	and Objections to Defendant's
17	(Appearing via telephone)	17	Interrogatories
18		18	
19		19	(ALL EXHIBITS WERE MARKED PRIOR TO THE DEPOSITION)
20		20	
21		21	
22		22	
23		23	
24		24	
25		25	
4	Deposition upon oral examination of	4	5
5	Pinkie Wood, taken on behalf of the Defendant, before	5	1 please speak up and ask me to repeat or rephrase the
6	Jill Hudnall Trail, Registered Professional Reporter, a	6	2 question. Otherwise, I'm going to assume that you
7	Notary Public for the Commonwealth of Virginia at	7	3 understood the question as asked. Is that fair?
8	large, taken pursuant to notice, commencing at	8	4 A. Yes.
9	10:30 a.m. on Thursday, October 10, 2019, at the	9	5 Q. I apologize that both counsel are on the
10	offices of Zahn Court Reporting, 208 East Plume Street,	10	6 phone this morning. There might be a little bit of a
11	Norfolk, Virginia; and this in accordance with the	11	7 delay between our questions and your answers. I will
12	Rules of the Supreme Court of Virginia, 1950, as	12	8 do my best not to ask a question and speak over you
13	amended.	13	9 while you're giving an answer, and likewise I ask that
14		14	10 you try to let me finish my question before you respond
15		15	11 to the question. Okay?
16	PINKIE WOOD was sworn and deposed on	16	12 A. Yes.
17	behalf of the Defendant as follows:	17	13 Q. And also, obviously, we cannot see you
18	EXAMINATION	18	14 this morning, so it's more important than normal that
19	BY MR. LITTLE:	19	15 you continue to give us verbal responses: yes, no, I
20	Q. Good morning, Ms. Wood.	20	16 don't know. We can't see your mannerisms or your
21	A. Good morning.	21	17 shoulder shrugs, because we're on the telephone this
22	Q. My name is Brendan Little. I am counsel	22	18 morning. Okay?
23	for Optio Solutions, LLC, and represent that company in	23	19 A. Yes.
24	a lawsuit commenced by Erick Rigby in Federal Court for	20	20 Q. Okay. What is your legal name?
25	the Western District of Wisconsin.	21	21 A. Pinky Elizabeth Wood.
26	Thank you for appearing this morning.	22	22 Q. And where do you reside?
27	I'm going to ask you a couple of questions related to	23	23 A. 5316 Larkspur Road, Portsmouth, Virginia
28	the allegations in that lawsuit. At any time if you	24	24 23703.
29	didn't hear my question, didn't understand my question,	25	25 Q. And how long have you resided at that

1 address?
 2 A. I have owned that property since June of
 3 1999.
 4 Q. Okay. And if I can turn your attention
 5 to Exhibit 3 this morning.
 6 A. Okay.
 7 Q. Do you have that in front of you?
 8 A. Yes, sir.
 9 Q. Okay. And is it fair to say that this is
 10 the subpoena that you were served with to testify this
 11 morning?
 12 A. Yes.
 13 Q. Okay. And you're appearing this morning
 14 pursuant to that subpoena?
 15 A. Correct.
 16 Q. Who is Erick Rigby?
 17 A. Erick Rigby is my son.
 18 Q. Okay. How often do you see your son,
 19 Erick?
 20 A. Generally I see my son, Erick, once or
 21 twice a year when I go there.
 22 Q. And go there meaning?
 23 A. When I go to Wisconsin.
 24 Q. Okay. And, I guess, just so I make sure
 25 that it's clear, your son does not reside in the State

6
 1 of Virginia? He resides in Wisconsin?
 2 A. That is correct.
 3 Q. And do you know how long your son has
 4 resided in Wisconsin?
 5 A. I believe that he has lived there between
 6 nine and ten years. I don't remember, I don't recall
 7 the exact date that he moved there.
 8 Q. How often do you speak to your son?
 9 A. Depending on what's going on, sometimes I
 10 will talk to him once a month. Sometimes I'll talk to
 11 him five times a day.
 12 Q. Okay. But is it fair to say that you're
 13 in regular communication with him?
 14 A. Yes.
 15 Q. What was the telephone number that you
 16 were using in January of 2019?
 17 A. Well, I may have used -- it may have been
 18 on my cell phone at (757) 285-9440, or it may have been
 19 on my cell phone (757) 319-0842. I'm not really sure
 20 which one.
 21 Q. Okay. The 0842 number, is that a
 22 personal cell phone or a work cell phone?
 23 A. It was my work cell phone, and it is now
 24 my personal cell phone.
 25 Q. I'm sorry. It was your personal cell

8
 1 phone and --
 2 A. No, sir. At that point in time, in
 3 January of 2019, I worked for Hourigan Construction,
 4 and that was my work cell phone. I left Hourigan
 5 Construction in February and turned it into my personal
 6 cell phone.
 7 Q. Understood.
 8 And the 9440 number, was that a personal
 9 cell phone then back in January of '19?
 10 A. That is the cell phone that is provided
 11 to me by Peters & White Construction for their
 12 business.
 13 Q. And do you still maintain that cell phone
 14 today?
 15 A. Yes, I do.
 16 Q. Okay. So in January of '19, you had both
 17 the 9440 number and the number ending in 0842, and
 18 that's still true today in October of 2019?
 19 A. That is correct. Yes, sir.
 20 Q. The only difference is that the 0842
 21 number was a work number back in January of '19, but
 22 today it is a personal number?
 23 A. That is correct.
 24 Q. Did you receive a telephone call from
 25 Optio Solutions, LLC?

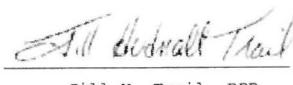
9
 1 A. I am not sure who I received a phone call
 2 from at this point. That was a long time ago, and I
 3 don't recall.
 4 Q. So you, as you sit here today, in October
 5 of '19, you don't recall whether you received a
 6 telephone call from Optio Solutions?
 7 A. No, sir. I'm not sure it was from Optio
 8 Solutions. What I do recall was calling my son and
 9 telling him I had received a call, and he got all
 10 angry, and that's about as much as I remember.
 11 Q. Okay. So let me make sure I understand
 12 you. You recall receiving a telephone call, but you're
 13 not quite sure who the call was from?
 14 A. No, sir. I'm not really sure. I'm
 15 sorry, but -- I apologize, sir.
 16 Q. Go ahead.
 17 A. But if it's not my business and it's not
 18 my bills, I don't worry about it.
 19 Q. No. I understand. I just wanted to make
 20 sure that we're saying the same thing.
 21 You recall receiving a telephone call
 22 regarding your son, correct?
 23 A. Yes, sir.
 24 Q. Okay. But you do not remember who the
 25 telephone call was from?

<p>1 A. No, sir. I don't. Like I said, if it 2 was a bill and someone called me, I would have asked, 3 "Who is this, and may I ask who is calling?" 4 And typically what happens, because I 5 have six children, so I've had this happen quite a bit, 6 they will say, "I'm so and so from such and such 7 company, and can you give me so and so's phone number 8 or information?" My response is no, because that's not 9 my job. My job is to call the child, whichever one of 10 the six that it pertains to and say, "You got a call 11 from so and so. You need to call them back." And 12 that's -- that's my -- that's what I do all of the time 13 with any one of the six children that I have raised.</p> <p>14 Q. Okay. And this telephone call that we've 15 been talking about this morning, do you remember when 16 you received that telephone call?</p> <p>17 A. No, sir.</p> <p>18 Q. Was this the only telephone call that you 19 can recall in the last year that you received regarding 20 your son, Erick?</p> <p>21 A. Truthfully, I don't track, sir. I really 22 don't know. It could have been this year. It could 23 have been last year. Again, I don't know.</p> <p>24 Q. Do you recall receiving a telephone call 25 from Optio Solutions at all?</p>	<p>10</p> <p>1 A. Sir, I don't recall anyone specifically 2 that I have received calls for, for my children, 3 because, again, I don't -- I don't give their 4 information out. When I get the call, I give the 5 children a phone call. I say, "Hey, you got a call 6 from so and so. You need to contact them and take care 7 of whatever."</p> <p>8 And so as far as Optio Solutions itself, 9 no, I don't recall getting a call from them exactly. 10 If you say I did, and you have it on record, I'm sure 11 that I did. But as far as do I recall that specific 12 one? No, I do not.</p> <p>13 Q. Okay. Optio Solutions -- I will 14 represent to you that Optio Solutions' records indicate 15 that they spoke to you on January 7th of 2019. Do you 16 have any reason to not believe that that date is 17 accurate?</p> <p>18 A. No. I don't.</p> <p>19 Q. Do you remember -- and I understand your 20 testimony this morning, but I have to ask these 21 questions to make sure I understand the allegations of 22 the lawsuit. Do you remember who the individual was 23 and the name of the individual that you spoke with from 24 Optio?</p> <p>25 A. No, sir. I do not.</p>
<p>1 Q. Do you remember if the person was a male 2 or a female?</p> <p>3 A. No, sir. I do not.</p> <p>4 Q. Do you remember the tone or the demeanor 5 of the call? Was it a polite call or a rude call?</p> <p>6 A. Well, I do not remember, but I'm sure you 7 would have it on record, because typically if people 8 are rude to me, I'm fairly rude back. So if I wasn't 9 rude, I'm sure it was polite.</p> <p>10 Q. Okay. And you briefly described this 11 morning, but I want to make sure I understand. What 12 was the sum and substance of the communication of the 13 telephone call that you recall?</p> <p>14 A. Sir, I don't recall the exact phone call; 15 that's what I'm saying. If they called me, which 16 you're telling me they did, I would have asked them who 17 they were, and I would have asked them for a number. I 18 would not have given them any of my children's 19 information. And then I would have relayed the message 20 to whichever child it was. So, again, I apologize, but 21 I do not recall that.</p> <p>22 Q. Okay. I'm going to direct your attention 23 to Exhibit 1.</p> <p>24 A. Okay. I have that.</p> <p>25 Q. Okay. And you would see up at the top</p>	<p>12</p> <p>1 A. I do see that, yes, sir.</p> <p>5 Q. Okay. And about a quarter of the way 6 down the page in the middle and in bold and underlined 7 in capital letters it says "Complaint"?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. Have you ever seen this document 10 before?</p> <p>11 A. No.</p> <p>12 Q. Okay. I'm going to take you over to page 13 3 and paragraph 20.</p> <p>14 A. Yes, sir.</p> <p>15 Q. Are you there?</p> <p>16 A. Yes. I'm here.</p> <p>17 Q. Okay. And it says, "Moreover, on at 18 least one other occasion, Defendant contacted 19 Plaintiff's mother and disclosed that he owes the 20 subject debt."</p> <p>21 Q. Do you recall a conversation with anyone 22 from Optio Solutions where Optio disclosed that your 23 son owed a debt?</p> <p>24 A. Sir, I do not recall any specifics. I'm 25 sure I asked who they were. I'm sure they said that it</p>
	<p>13</p> <p>1 the caption reads "Erick D. Rigby versus Crosscheck 2 Services, LLC, d/b/a Optio Solutions, LLC." Do you see 3 that.</p> <p>4 A. I do see that, yes, sir.</p> <p>5 Q. Okay. And about a quarter of the way 6 down the page in the middle and in bold and underlined 7 in capital letters it says "Complaint"?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. Have you ever seen this document 10 before?</p> <p>11 A. No.</p> <p>12 Q. Okay. I'm going to take you over to page 13 3 and paragraph 20.</p> <p>14 A. Yes, sir.</p> <p>15 Q. Are you there?</p> <p>16 A. Yes. I'm here.</p> <p>17 Q. Okay. And it says, "Moreover, on at 18 least one other occasion, Defendant contacted 19 Plaintiff's mother and disclosed that he owes the 20 subject debt."</p> <p>21 Q. Do you recall a conversation with anyone 22 from Optio Solutions where Optio disclosed that your 23 son owed a debt?</p> <p>24 A. Sir, I do not recall any specifics. I'm 25 sure I asked who they were. I'm sure they said that it</p>

<p>1 was a personal matter, which is in my mind, raising six 2 children, an implication that they owe somebody 3 something.</p> <p>4 Q. Understood.</p> <p>5 And if I could move you over to page 5, 6 paragraph 30.</p> <p>7 A. Yes, sir.</p> <p>8 Q. It says, "Defendant violated 15 U.S.C. 9 Section 1692d(2), on at least one occasion: when it 10 contacted Plaintiff's mother and disclosed that 11 Plaintiff owes the subject debt."</p> <p>12 A. I see that.</p> <p>13 Q. Okay. And would your answer be any 14 different if I asked you that, do you recall a 15 conversation with Optio where it disclosed that your 16 son owed a debt?</p> <p>17 A. No, sir. My answer is no different. I 18 do not recall that conversation.</p> <p>19 Again, I have raised six children, and I 20 have had these conversations many times.</p> <p>21 Q. Understood.</p> <p>22 If I could turn your attention to Exhibit 23 Number 2.</p> <p>24 A. Yes, sir.</p> <p>25 Q. And, again, at the top it is a caption</p>	<p>14</p> <p>1 that says, "Erick D. Rigby versus Crosscheck Services, 2 LLC." Do you see that?</p> <p>3 A. Yes, sir.</p> <p>4 Q. And about a quarter of the way down the 5 page in bold and capital letters it says, "Plaintiff's 6 Amended Supplemental Answers and Objections to 7 Defendant's Interrogatories." Do you see that?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. Have you ever seen this document 10 before?</p> <p>11 A. No.</p> <p>12 Q. If I could direct your attention to page 13 number 7.</p> <p>14 A. Yes, sir.</p> <p>15 Q. And actually it starts on the bottom of 16 page 6. It says "Interrogatory Number 12," and then 17 goes over onto page 7.</p> <p>18 A. Yes, sir.</p> <p>19 Q. Okay. And the response there states, 20 about halfway through the response, "Nevertheless, 21 Plaintiff states that Defendant contacted his mother 22 and disclosed that he owes the subject debt in 2018. 23 Plaintiff does not recall the precise date or the name 24 of the individual he spoke to."</p> <p>25 Would your answer be any different from</p>
<p>16</p> <p>1 the prior questions? Do you recall a conversation with 2 Optio where Optio disclosed that your son owed a debt?</p> <p>3 A. No, sir. My answer is not any different.</p> <p>4 Q. Okay. Do you recall there being more 5 than one conversation with Optio or just the one, or 6 just the one call that we've been talking about this 7 morning?</p> <p>8 A. Sir, I've told you that I don't recall 9 speaking specifically to Optio at all. So, again, I 10 can't -- I cannot say definitively whether I spoke with 11 them one time or whether I spoke with them ten times.</p> <p>12 Q. Understood.</p> <p>13 A. I do not know.</p> <p>14 Q. Understood.</p> <p>15 Prior to sitting here for this deposition 16 this morning, did you talk to anyone regarding this 17 phone call that we've been talking about today?</p> <p>18 A. Can you please say that again?</p> <p>19 Q. I'm going to pick up the telephone, 20 because I'm getting a little feedback. Maybe that will 21 be a little bit better.</p> <p>22 A. Thank you.</p> <p>23 Q. Prior to testifying today at this 24 deposition, have you spoken to anyone else about this 25 telephone call that we've discussed this morning?</p>	<p>16</p> <p>1 A. I told my son that I got a subpoena, and 2 I didn't know what it was for.</p> <p>3 Q. Okay. Have you spoken to anyone that you 4 understood to be part of your son's legal team 5 regarding this telephone call?</p> <p>6 A. No. Absolutely not.</p> <p>7 MR. LITTLE: Okay. That's all of the 8 questions I have for you. I'm sure Mr. Volheim will 9 have a few.</p> <p>10 THE WITNESS: Okay.</p> <p>11 EXAMINATION</p> <p>12 BY MR. VOLHEIM:</p> <p>13 Q. Good morning, Ms. Wood. My name is Nate 14 Volheim. I represent your son in this matter. It's 15 nice to speak to you for the first time today.</p> <p>16 How are you?</p> <p>17 A. I'm fine, sir.</p> <p>18 Q. Good. And I know you've told Counsel, 19 but you can confirm that you've never spoken with me or 20 anyone from my office before today; is that correct?</p> <p>21 A. That is correct.</p> <p>22 Q. Okay. I'm not going to take up much of 23 your time, and I do thank you very much for being here 24 this morning. I've got about five minutes worth of 25 questions for you. Okay?</p>

18	19
<p>1 Do you have -- have you ever had any 2 relationship with Ashley Furniture Store? 3 A. I've looked at furniture. 4 Q. Okay. Other than looking at furniture, 5 have you ever made any purchases from Ashley Furniture 6 Store? 7 A. No. 8 Q. Have you ever provided any cell phone 9 number or telephone number that you had to Ashley 10 Furniture Store? 11 A. The only thing I have ever provided to 12 Ashley Furniture was when I was looking at some 13 furniture, I gave them my information so that they 14 could call me if a piece of furniture went on sale, and 15 that was for mine and my husband's home, but other than 16 that, no, sir. I have not. 17 Q. Okay. Approximately, and I'm sure I'm 18 asking you to go back in your memory, but approximately 19 when was that? 20 A. Probably in March of this year. 21 Q. Okay. But when you provided your phone 22 number to Ashley, it had nothing to do with your son or 23 any purchases you may or may not have made from Ashley 24 Furniture; is that correct? 25 A. That is correct.</p>	<p>1 Q. Okay. Regarding -- Counsel has been 2 asking you about Optio, and for the record, Optio goes 3 by several different names. I'm going to give you 4 those names now. It's also Crosscheck Services, LLC, 5 Optio Solutions, LLC, and Qualia Collection Services. 6 Other than before today, have you ever 7 heard of any of those companies? 8 MR. LITTLE: Object to the form. 9 THE WITNESS: Sir, I'm going to give you 10 the same exact answer that I gave the gentleman 11 earlier. I do not recall. I get calls for one of my 12 children regularly, and I don't know. 13 BY MR. VOLHEIM: 14 Q. Understood. 15 To your knowledge, did your son ever 16 provide your cell phone number to either Ashley 17 Furniture or to Optio Solutions? 18 A. Not to my knowledge. 19 Q. Did you give your permission for your son 20 to provide your cell phone number to either Ashley 21 Furniture or Optio Solutions? 22 A. Not that I recall. 23 Q. Okay. Just a couple of more questions. 24 And, again, thank you for your time. 25 I'm very clear that you do not remember</p>
20	21
<p>1 the specifics of any conversation you may or may not 2 have had with Optio, okay, so I will keep that in mind. 3 However, if your son represented or filed 4 this lawsuit stating that you told him Optio Solutions 5 called you and was looking to collect on a debt, do you 6 have any reason to doubt your son's memory of those 7 events? 8 A. No. 9 MR. LITTLE: Object to the form. 10 BY MR. VOLHEIM: 11 Q. Can you answer that again? I'm sorry. 12 Counsel's objection, I think, went over your answer. 13 A. No. I don't have any reason to doubt my 14 son saying that. 15 Q. If Optio Solutions would -- okay. In a 16 situation -- strike that. 17 In a situation where you have received a 18 phone call for one of your children, it sounds like you 19 do relay the message to your kids; is that correct? 20 A. That is correct. 21 Q. Do you always relay the message to your 22 children? 23 A. Yes, I do. 24 Q. Okay. And do you do your best to 25 accurately and completely relay the message that you</p>	<p>1 were given to your children? 2 A. Yes, I do. 3 Q. Do you have any reason to believe that 4 your son did not accurately and truthfully represent 5 your conversation with him regarding this lawsuit? 6 MR. LITTLE: Object to the form. 7 THE WITNESS: No. I don't have any 8 reason to doubt what my son would say. 9 BY MR. VOLHEIM: 10 Q. And then Counsel showed you -- just for 11 clarity, Counsel showed you Exhibit 1 and Exhibit 2 12 today. Do you recall seeing those two exhibits? 13 A. No. I have not. 14 Q. I'm sorry. Let me clarify. I asked a 15 bad question. I apologize. 16 You have not seen them before today; is 17 that correct? 18 A. That is correct. I have not seen them 19 before today. 20 Q. So you didn't participate in the drafting 21 or the creation of those documents? 22 A. No. The first I knew of any of this was 23 when I received a subpoena. 24 Q. Okay. Your son -- strike that. 25 Either your son or anyone else has not</p>

	22
1 promised you any money or benefits for testifying here	23
2 today, have they?	
3 A. No. No. They have not.	
4 MR. VOLHEIM: All right. Ms. Wood, I	
5 don't have any other questions, subject to whatever	
6 Mr. Little may ask you.	
7 CONTINUED EXAMINATION	
8 BY MR. LITTLE:	
9 Q. Ms. Wood, I just have a couple of	
10 follow-ups.	
11 A. Okay.	
12 Q. After you received the telephone call	
13 that we've been speaking about this morning, do you	
14 remember either specifically or generally what you told	
15 your son when you contacted him?	
16 A. No. I do not. I told you, sir, I relay	
17 the messages. I won't give any creditors their	
18 information, but I always call the kids and say, "Look,	
19 you need to take care of this. So and so called about	
20 whatever." And if they don't tell me why they're	
21 calling, I tell them, "I don't know why they're	
22 calling, but they said that you need to call these	
23 people."	
24 Q. And so you don't have a specific	
25 recollection -- I know we've talked about it ad	

	24
1 COMMONWEALTH OF VIRGINIA AT LARGE, to-wit:	
2	
3 I, Jill Hudnall Trail, Registered Professional	
4 Reporter, a Notary Public for the Commonwealth of	
5 Virginia at Large, of qualification in the Circuit	
6 Court of the City of Norfolk, Virginia, and whose	
7 commission expires May 31, 2021, do hereby certify that	
8 the within-named deponent, Pinkie Wood, appeared before	
9 me at Norfolk, Virginia; that her examination was	
10 recorded in stenotype by me; and that the foregoing	
11 constitutes a true, accurate, and complete transcript	
12 of such proceeding.	
13 I further certify that I am not related to nor	
14 otherwise associated with any counsel or party to this	
15 proceeding nor otherwise interested in the event	
16 thereof.	
17 Given under my hand and notarial seal this 18th day	
18 of October, 2019, at Norfolk, Virginia.	
19	
20	
21	
22	
23	
 Jill H. Trail, RPR	
24	
25	

Exhibits Exhibit # 1 Wood 10-10-19 12:23 21:11 Exhibit # 2 Wood 10-10-19 14:22,23 21:11 Exhibit # 3 Wood 10-10-19 6:5 0 0842 7:21 8:17,20 1 1 12:23 21:11 10 4:6 10:30 4:6 10:51 23:21 12 15:16 15 14:8 1692d(2) 14:9 19 8:9,16,21 9:5 1950 4:9 1999 6:3 2 2 14:23 21:11 20 13:13 2018 15:22 2019 4:6 7:16 8:3,18 11:15 208 4:7 23703 5:24 3 3 6:5 13:13	30 14:6 5 5 14:5 5316 5:23 6 6 15:16 7 7 15:13,17 757 285-9440 7:18 757 319-0842 7:19 7th 11:15 9 9440 8:8,17 A a.m. 4:6 23:21 Absolutely 17:6 accordance 4:8 accurate 11:17 accurately 20:25 21:4 ad 22:25 address 6:1 ahead 9:16 allegations 4:24 11:21 amended 4:10 15:6 angry 9:10 answers 5:7 15:6 apologize 5:5 9:15 12:20 21:15 appearing 4:22 6:13 approximately	18:17,18 Ashley 18:2,5,9,12, 22,23 19:16,20 assume 5:2 attention 6:4 12:22 14:22 15:12 B back 8:9,21 10:11 12:8 18:18 bad 21:15 behalf 4:2,13 benefits 22:1 bill 10:2 bills 9:18 bit 5:6 10:5 16:21 bold 13:6 15:5 bottom 15:15 Brendan 4:18 23:15 briefly 12:10 business 8:12 9:17 C call 8:24 9:1,6,9,12, 13,21,25 10:9,10,11, 14,16,18,24 11:4,5,9 12:5,13,14 16:6,17, 25 17:5 18:14 20:18 22:12,18,22 23:3 called 10:2 12:15 20:5 22:19 calling 9:8 10:3 22:21,22 calls 11:2 19:11 capital 13:7 15:5 caption 13:1 14:25 care 11:6 22:19 cell 7:18,19,22,23, 24,25 8:4,6,9,10,13 18:8 19:16,20	child 10:9 12:20 children 10:5,13 11:2,5 14:2,19 19:12 20:18,22 21:1 children's 12:18 clarify 21:14 clarity 21:11 clear 6:25 19:25 23:1 collect 20:5 Collection 19:5 commenced 4:20 commencing 4:5 Commonwealth 4:4 communication 7:13 12:12 companies 19:7 company 4:19 10:7 Complaint 13:7 completely 20:25 concluded 23:22 confirm 17:19 Construction 8:3,5, 11 contact 11:6 contacted 13:18 14:10 15:21 22:15 continue 5:15 CONTINUED 22:7 conversation 13:21 14:15,18 16:1,5 20:1 21:5 conversations 14:20 copy 23:16,19 correct 6:15 7:2 8:19,23 9:22 17:20, 21 18:24,25 20:19,20 21:17,18 counsel 4:18 5:5 17:18 19:1 21:10,11
---	--	---	---

23:13 Counsel's 20:12 couple 4:23 19:23 22:9 Court 4:7,9,20 creation 21:21 creditors 22:17 Crosscheck 13:1 15:1 19:4	D d/b/a 13:2 date 7:7 11:16 15:23 day 7:11 23:10 debt 13:20,23 14:11, 16 15:22 16:2 20:5 Defendant 4:2,13 13:18 14:8 15:21 Defendant's 15:7 definitively 16:10 delay 5:7 demeanor 12:4 Depending 7:9 deposed 4:12 deposition 4:1 16:15,24 23:22 difference 8:20 direct 12:22 15:12 disclosed 13:19,22 14:10,15 15:22 16:2 discussed 16:25 District 4:21 document 13:9 15:9 documents 21:21 doubt 20:6,13 21:8 drafting 21:20	E earlier 19:11 East 4:7 electronic 23:19 Elizabeth 5:21 ending 8:17 Erick 4:20 6:16,17, 19,20 10:20 13:1 15:1 events 20:7 exact 7:7 12:14 19:10 examination 4:1,14 17:11 22:7 Exhibit 6:5 12:23 14:22 21:11 exhibits 21:12 23:19	generally 6:20 22:14 gentleman 19:10 give 5:15 10:7 11:3,4 19:3,9,19 22:17 giving 5:9 good 4:16,17 17:13, 18 23:10 guess 6:24	H halfway 15:20 happen 10:5 hear 4:25 heard 19:7 Hey 11:5 home 18:15 Hourigan 8:3,4 Hudnall 4:3 husband's 18:15	K kids 20:19 22:18 knew 21:22 knowledge 19:15, 18
		F fair 5:3 6:9 7:12 fairly 12:8 February 8:5 Federal 4:20 feedback 16:20 female 12:2 filed 20:3 fine 17:17 finish 5:10 follow-ups 22:10 form 19:8 20:9 21:6 front 6:7 furniture 18:2,3,4,5, 10,12,13,14,24 19:17,21	I implication 14:2 important 5:14 individual 11:22,23 15:24 information 10:8 11:4 12:19 18:13 22:18 Interrogatories 15:7 Interrogatory 15:16	M made 18:5,23 maintain 8:13 make 6:24 9:11,19 11:21 12:11 23:1 male 12:1 mannerisms 5:16 March 18:20 matter 14:1 17:14 meaning 6:22 memory 18:18 20:6 message 12:19 20:19,21,25 messages 22:17 middle 13:6 mind 14:1 20:2	
		G gave 18:13 19:10	J January 7:16 8:3,9, 16,21 11:15 Jill 4:3 job 10:9 June 6:2		

mine 18:15	9 19:2,5,17,21 20:2, 4,15 23:2	precise 15:23	record 11:10 12:7 19:2
minutes 17:24	oral 4:1	prior 16:1,15,23	records 11:14
money 22:1	owe 14:2	Professional 4:3	Registered 4:3
month 7:10	owed 13:23 14:16 16:2	promised 22:1	regular 7:13
morning 4:16,17,22 5:6,14,18 6:5,11,13 10:15 11:20 12:11 16:7,16,25 17:13,24 22:13 23:8	owes 13:19 14:11 15:22	property 6:2	regularly 19:12
mother 13:19 14:10 15:21	owned 6:2	provide 19:16,20	related 4:23
move 14:5	P	provided 8:10 18:8, 11,21	relationship 18:2
moved 7:7	paragraph 13:13 14:6	Public 4:4	relay 20:19,21,25 22:16
N	part 17:4	purchases 18:5,23	relayed 12:19
names 19:3,4	participate 21:20	pursuant 4:5 6:14	remember 7:6 9:10, 24 10:15 11:19,22 12:1,4,6 19:25 22:14
Nate 17:13 23:18	PDF 23:16,19	Q	repeat 5:1
nauseam 23:1	people 12:7 22:23	Qualia 19:5	rephrase 5:1
nice 17:15	permission 19:19	quarter 13:5 15:4	Reporter 4:3 23:13, 17,20
Norfolk 4:8	person 12:1	question 4:25 5:2,3, 8,10,11 21:15	Reporting 4:7
normal 5:14	personal 7:22,24,25 8:5,8,22 14:1	questions 4:23 5:7 11:21 16:1 17:8,25 19:23 22:5 23:7	represent 4:19 11:14 17:14 21:4
Notary 4:4	pertains 10:10	R	represented 20:3
notice 4:5	Peters 8:11	raised 10:13 14:19	reside 5:22 6:25
number 7:15,21 8:8, 17,21,22 10:7 12:17 14:23 15:13,16 18:9, 22 19:16,20	phone 5:6 7:18,19, 22,23,24 8:1,4,6,9, 10,13 9:1 10:7 11:5 12:14 16:17 18:8,21 19:16,20 20:18	raising 14:1	resided 5:25 7:4
O	pick 16:19	reads 13:1	resides 7:1
Object 19:8 20:9 21:6	piece 18:14	reason 11:16 20:6, 13 21:3,8	respond 5:10
objection 20:12	Pinkie 4:2,12	recall 7:6 9:3,5,8,12, 21 10:19,24 11:1,9, 11 12:13,14,21 13:21,24 14:14,18 15:23 16:1,4,8 19:11, 22 21:12	response 10:8 15:19,20
Objections 15:6	Plaintiff 14:11 15:21,23	receive 8:24	responses 5:15
occasion 13:18 14:9	Plaintiff's 13:19 14:10 15:5	received 9:1,5,9 10:16,19 11:2 20:17 21:23 22:12	Rigby 4:20 6:16,17 13:1 15:1
October 4:6 8:18 9:4	Plume 4:7	receiving 9:12,21 10:24	Road 5:23
office 17:20	point 8:2 9:2	recollection 22:25 23:2	rude 12:5,8,9
offices 4:7	polite 12:5,9		Rules 4:9
Optio 4:19 8:25 9:6,7 10:25 11:8,13,14,24 13:2,22 14:15 16:2,5,	Portsmouth 5:23		S
			sale 18:14
			Section 14:9
			served 6:10

Services 13:2 15:1 19:4,5 shoulder 5:17 showed 21:10,11 shrugs 5:17 sincerely 23:7 sir 6:8 8:2,19 9:7,14, 15,23 10:1,17,21 11:1,25 12:3,14 13:4, 14,24 14:7,17,24 15:3,14,18 16:3,8 17:17 18:16 19:9 22:16 23:4 sit 9:4 sitting 16:15 situation 20:16,17 so's 10:7 Solutions 4:19 8:25 9:6,8 10:25 11:8,13 13:2,22 19:5,17,21 20:4,15 Solutions' 11:14 son 6:17,18,20,25 7:3,8 9:8,22 10:20 13:23 14:16 16:2 17:1,14 18:22 19:15, 19 20:3,14 21:4,8,24, 25 22:15 son's 17:4 20:6 sounds 20:18 speak 5:1,8 7:8 17:15 speaking 16:9 22:13 specific 11:11 22:24 23:2 specifically 11:1 16:9 22:14 specifics 13:24 20:1 spoke 11:15,23 15:24 16:10,11 spoken 16:24 17:3, 19 starts 15:15	State 6:25 states 15:19,21 stating 20:4 Store 18:2,6,10 Street 4:7 strike 20:16 21:24 subject 13:20 14:11 15:22 22:5 subpoena 6:10,14 17:1 21:23 substance 12:12 sum 12:12 Supplemental 15:6 Supreme 4:9 sworn 4:12	today 8:14,18,22 9:4 16:17,23 17:15,20 19:6 21:12,16,19 22:2 told 16:8 17:1,18 20:4 22:14,16 tone 12:4 top 12:25 14:25 track 10:21 Trail 4:3 transcribed 23:14 true 8:18 truthfully 10:21 21:4 turn 6:4 14:22 turned 8:5 typically 10:4 12:7	whichever 10:9 12:20 White 8:11 Wisconsin 4:21 6:23 7:1,4 Wood 4:2,12,16 5:21 17:13 22:4,9 23:6 work 7:22,23 8:4,21 worked 8:3 worry 9:18 worth 17:24
	T	U	Z
	talk 7:10 16:16 talked 22:25 talking 10:15 16:6, 17 team 17:4 telephone 5:17 7:15 8:24 9:6,12,21,25 10:14,16,18,24 12:13 16:19,25 17:5 18:9 22:12 23:3 telling 9:9 12:16 ten 7:6 16:11 testify 6:10 testifying 16:23 22:1 testimony 11:20 thing 9:20 18:11 Thursday 4:6 time 4:24 8:2 9:2 10:12 16:11 17:15,23 19:24 23:8 times 7:11 14:20 16:11	U.S.C. 14:8 underlined 13:6 understand 4:25 9:11,19 11:19,21 12:11 understood 5:3 8:7 14:4,21 16:12,14 17:4 19:14	Zahn 4:7
		V	
		verbal 5:15 versus 13:1 15:1 violated 14:8 Virginia 4:4,8,9 5:23 7:1 Volheim 17:8,12,14 19:13 20:10 21:9 22:4 23:6,18	
		W	
		wanted 9:19 Western 4:21	